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**From:** MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]  
**Sent:** 5/22/2018 4:28:24 PM  
**To:** Bradfish, Larry [Bradfish.Larry@epa.gov]; Alasti, Isabella@DTSC [Isabella.Alasti@dtsc.ca.gov]; Lancaster, David@Waterboards [David.Lancaster@Waterboards.ca.gov]  
**CC:** Black, Stewart@Waterboards [Stewart.Black@Waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]; Fennessy, Christopher [christopher.fennessy@Rocket.com]; MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]  
**Subject:** Area 40 ARAR Table  
**Attachments:** Area 40 ARARs AMM 5-22-18.xlsx

Larry: Here are the things that I did to respond to your comments embedded in the table. Here I reference you comment on the listed line. I have attached the table to make a couple of corrections in my second look through the table. I have not addressed the comments on the DTSC-designated ARARs and will let them do so. Their ARAR are in a light purple.

1. On line 10- made the change requested.
2. Line 11 -did not make any changes. Kept in as it was in the OU 6 ROD.
3. Lines 13-18 - moved to action-specific as requested.
4. Line 20 – combined with Line 11 as recommended. Just did that and so is found in the latest version that is attached.
5. Lines 22 and 23 – original had thought of deleting them. However, the excavation of the sumps will impact so wetlands that the City had proposed to preserve. It is not known where Aerojet will place the OU-10 soils for remediation (if that option is pursued) so the 100-year flood plain may come into play.
6. Lines 32-38 – Moved to action-specific as requested.
7. Lines 39-44 – DTSC ARAR issues so I did not modify at this time.
8. Line 60. Added text stating that EPA considers this a most to be a TBC.
9. Line 62. Did not make the change as we still must have this for the State evaluation of the project.
10. Line 68. Made some wording changes – see new line 62.
11. Lines 71, 72, 73. One can consider the old sumps as waste management units.
12. Line 74 – made the requested change.
13. Line 78 – Did not make the change as we still must have this for the State evaluation of the project.
14. Line 80. Made changes requested. The groundwater in OU-10 is considered a source of drinking water until it is demonstrated that is should not be. That case has not been made.
15. Line 81-90. Did not address as they are DTSC ARARs.
16. Line 91 – made change.

Alex